

Your honors at the FCC,

I strongly support RM-10352. A valuable part of the amateur radio service lies in its ability to add to the pool of scientific knowledge. Our planet's atmosphere is the subject of scientific and political debate. The effect the atmosphere has on radio propagation gives us clues about its nature. In particular, propagation effects on the 160 meter amateur band are not nearly as predictable as propagation on any other frequency. This suggests a missing link in our body of knowledge of the atmosphere. While it is true that most amateur operations are not, by nature, scientific, those enthusiastic amateurs who assiduously attempt to crack the mysteries of propagation do a credible job of documenting their work, and applying sound scientific analysis. See, for instance, the works of Cary Oler, Dr. Ted Cohen, and others via their "Solar Terrestrial Dispatch" organization, found on the web at <http://www.spacew.com>. There, you will find copious references to amateur work on the 160 meter band.

It is critical to note that, because of the atmospheric absorption on these frequencies, the vast majority of the weak-signal work is done via the narrowband mode of CW. Wideband voice modes simply do not function for this weakest of weak-signal effort.

Many amateur operators using wideband voice modes (SSB or AM, for instance) are not a part of the weak signal efforts, and therefore are not listening for weak signals when they select an operating frequency. Therefore, they may, quite unintentionally, interrupt a weak signal conversation in progress, or prevent one from occurring that is being attempted.

There is a gentleman's agreement in place that is generally followed, but it is by no means completely adhered to. By implementing this gentleman's agreement in the form of a law, the wideband operators will be constrained to the frequencies above 1.843 MHz, and need not understand the particulars of why this is necessary.

This is the first time I have been inclined to comment on FCC regulations governing the amateur service. I am offering my support because I believe this regulation is crucial to the continuing advancement in communications and atmospheric research that is being assisted by the weak signal work being done by the amateur community.

With respect,

David N. Haupt
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